

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE:

W. R. GRACE & CO., et al.

Debtors.

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Chapter 11

Case No. 01-01139 (JKF)
(Jointly Administered)
Related to Doc. No. 14598, 14599, 15153
and 15216

**CERTIFICATION OF COUNSEL REGARDING ORDER VACATING APRIL 17, 2007
ORDER DISALLOWING AND EXPUNGING NINE (9) PROPERTY DAMAGE
CLAIMS BARRED BY STATUTES OF LIMITATIONS [DOCKET NO. 15216]**

1. On February 16, 2007, the Debtors and Debtors in Possession filed the *Debtors' Motion and Memorandum for an Order Pursuant to F.R.B.P. 7056 Disallowing and Expunging Sixteen (16) Time-Barred Asbestos Property Damage Claims* (the "Motion") seeking an order disallowing and expunging the claims set forth in the exhibits attached to the Motion. (Docket No. 14598).

2. A hearing on the Motion was held on April 9, 2007. At the hearing, counsel for the Debtors requested leave to file an amended proposed order in connection with the Motion that deleted claims covered by the Court's order on the "Not a Grace Product" motion or where no opposition to the Motion was received, deleted claims of Martin Dies, and corrected an errant claim number. The Court indicated that Debtors could file such an order.

3. On April 11, 2007, Debtors filed the amended proposed Order Disallowing and Expunging Nine (9) Property Damage Claims Barred by Statutes of Limitations (the "Order") with the Court in connection with the Motion (Docket No. 15153). The Certificate of Counsel that was submitted with the Order, however, was submitted in error, suggested that the Court had made a decision on the Motion and did not adequately specify the limited purpose and nature of the Order.

4. On April 17, 2007, the Court entered the Order that was submitted by the Debtors.
(Docket No. 15216).

5. Because the Debtors did not intend for the Court to enter the Order prior to full consideration of the pending summary judgment briefs, the Order should be vacated at this time.

6. Accordingly, Debtors respectfully request that the Court enter the attached Proposed Order vacating the April 17, 2007 Order at its earliest convenience.

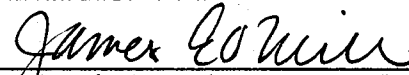
Dated: April 18, 2007

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